Exhibit B to the Complaint.

U.S. Patent No. 8,204,437 v. TP-Link
Claim 1 [Only one Claim for Complaint]
TP-Link has wireless security cameras such as Tapo C125 and Tapo C211 (taken as an exemplary products) that are connected via Wi-Fi.

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1. Claim Chart

Claim	Analysis
[1.P] A system to distribute at least one digital photographic image, said system comprising:	TP-Link ("Company") makes, uses, sell, and/or offers to sell a system to distribute at least one digital photographic image. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, Company provides wireless security cameras such as Tapo C125 and Tapo C211 (taken as an exemplary product), that are connected via Wi-Fi and comprise a feature of motion and person detection in which users create a customizable marked area called an activity zone, such that if motion is detected within the activity Zone, the camera notifies the user by sending an alert through the Tapo app and uploading the recording or snapshot to the video library ("distribute at least one digital photographic image"). Further, the setting up of the camera requires that the camera and the receiver device such as a phone or a tablet are connected to the same Wi-Fi network and paired with each other.

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Pan/Tilt Home Security Wi-Fi Camera
Tapo C211

- **2K 3MP High Definition:** Capture every detail inside your home with crystal-clear 2K high definition video with this indoor security camera.
- **Up, Down, All Around:** See everything across an entire room or walkway with the 360° horizontal and 114° vertical range pan/tilt field of view.
- **Detection & Instant Notification:** Get instant push notifications when motion , baby crying detection or a person is detected .
- **Night Vision up to 30 Ft.:** Never miss a thing that goes on, even at night.
- **Precise Motion Tracking:** Tracks and follows the subject to keep it within your view to keep an eye on the action.
- **2-Way Audio:** Enables real-time conversational communication through a built-in microphone and speaker. Never truly leave home with the built-in 2-way audio.
- **Privacy Zone:** Set customizable block zones to keep certain spaces from being recorded so you never need to worry about personal moments being leaked.
- **Device Sharing:** View your Wi-Fi camera feed from two different smart phone devices. Now mom and dad can both see what's happening at home with a single camera.
- **Secure Local or Cloud Storage:** Save footage continuously on up to a 512 GB microSD card† or subscribe to Tapo Care for cloud storage.‡
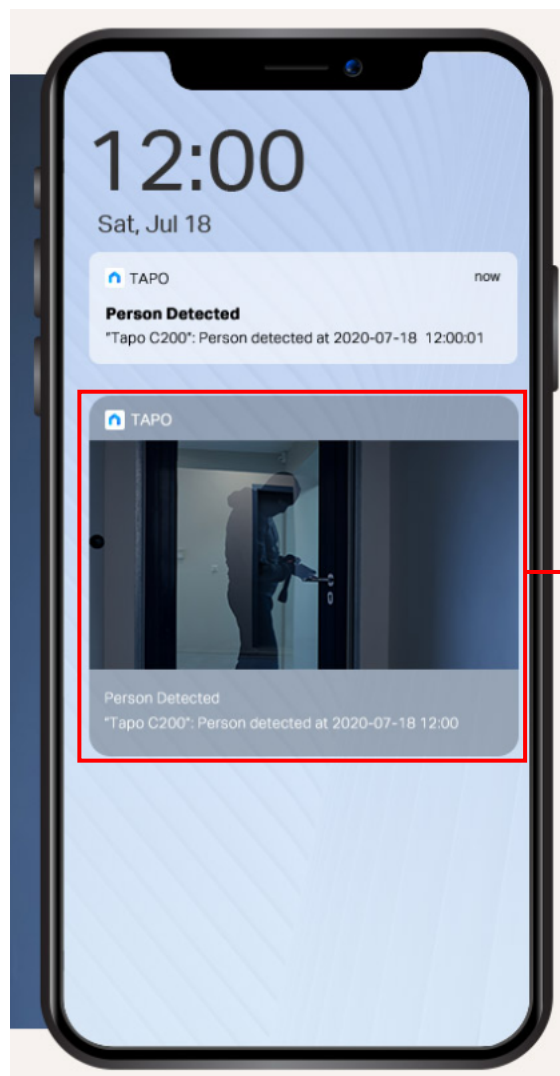- **Voice Control:** Works with the Google Assistant and Amazon Alexa to free up your hands.*

Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-overview

Rich Notifications with Snapshots

Smart alerts notify you in real-time the instant your camera detects person with a snapshot. Instantly review the related video clip to know exactly what's happening anytime there is unusual activity.

Source: https://www.tapo.com/us/tapocare/
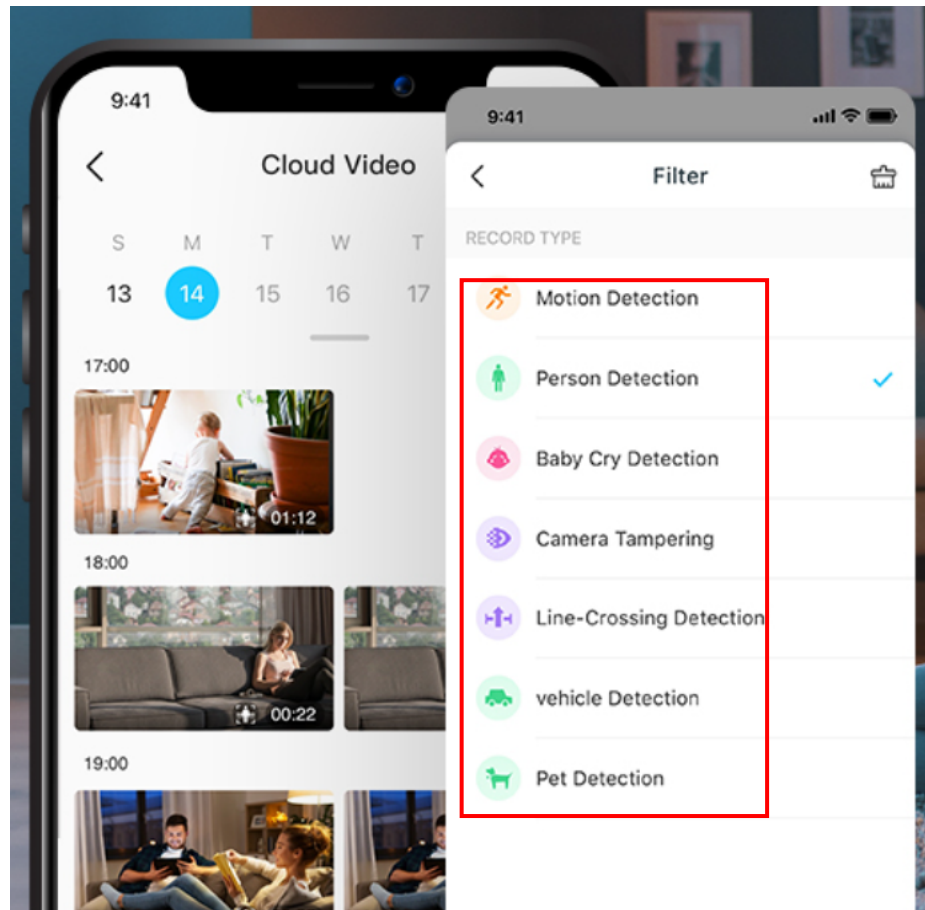
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Digital photographic image

Source: https://www.tapo.com/us/tapocare/ (annotated)

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Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-overview

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Source: https://www.tapo.com/us/tapocare/

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<table>
<tr>
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App Store Preview

Open the Mac App Store to

TP-Link Tapo 4+
Smart Home
TP-LINK GLOBAL INC.
Designed for iPad

#133 in Lifestyle
★★★★★ 4.7 • 2.5K Ratings

Free · Offers In-App Purchases

Source: https://apps.apple.com/us/app/tp-link-tapo/id1472718009

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
</td>
</tr>
<tr>
<td>[1.1] at least one capturing device and at least one receiving device,</td>
<td>

Company provides at least one capturing device and at least one receiving device.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the TP C211 camera ("capturing device") is paired with the Tapo app installed on the user's mobile device such as the phone or the tablet ("receiving device") using the Wi-Fi network.
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</table>

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Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-overview (annotated)

Exhibit B to the Complaint.

Source: https://www.tapo.com/us/tapocare/ (annotated)
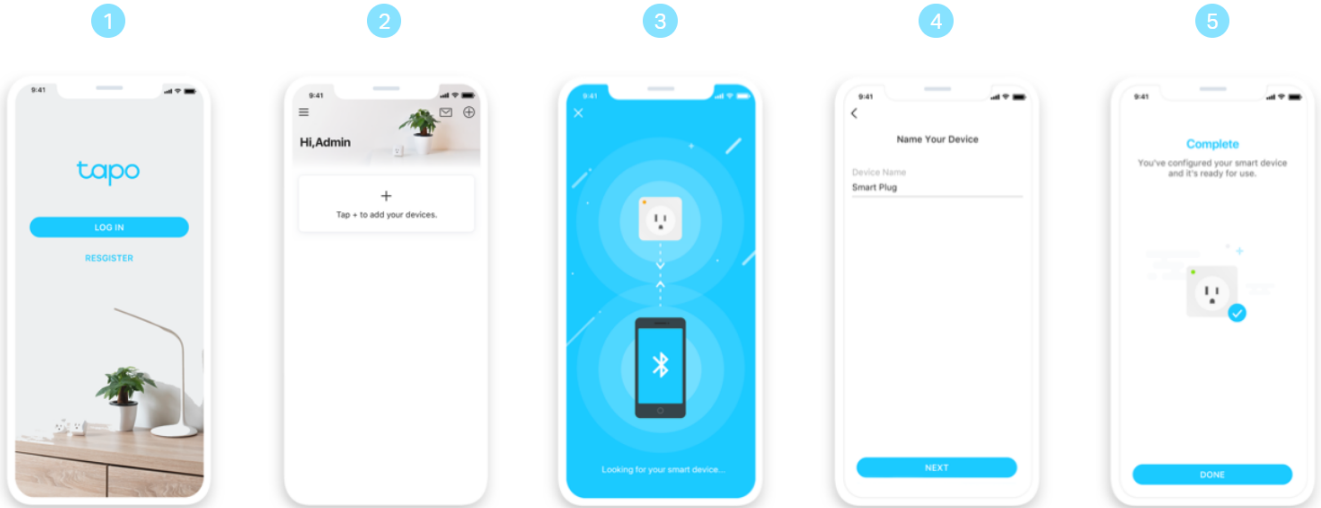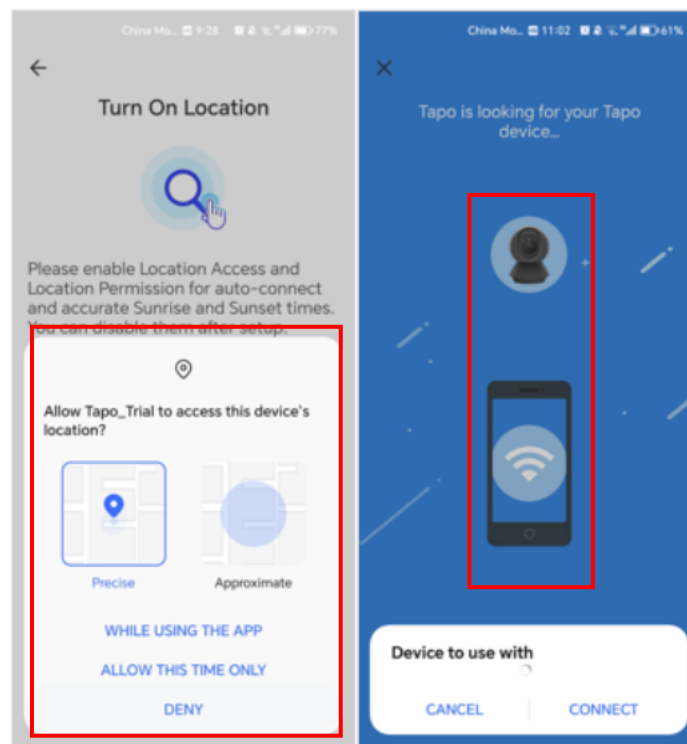
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	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
[1.2] said capturing device and said receiving device being cooperatively disposable in a communicative relation with one another via at least one wireless network,	Company provides at least one capturing device and at least one receiving device, wherein the said capturing device and said receiving device being cooperatively disposable in a communicative relation with one another via at least one wireless network. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, to pair the camera, the Tapo app searches for the camera by granting the location permission. Further, when the camera is searched, the camera is connected to the home Wi-Fi network ("at least one wireless network") such that the camera is paired ("communicative relation with one another") with the user's mobile device. Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-setup

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3. Grant the location access and allow the location permission to find and connect to your camera. You can disable it after the setup. Then it will start looking for your camera.

Source: https://www.tp-link.com/us/support/faq/2710/

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4. After the camera is found, connect the camera to your home Wi-Fi network and enter the password. Click **Next**. Choose Your Network Select a 2.4GHz network for your Tapo device to connect to. cameratest TP-Link_Guest_B0E02.4 Terry TP-Link_59C0 dont touch iot MERCUSYS_ED55 X55 pro !!!DPI_Zane Tapo_Hub_132E Can't find your Wi-Fi? Enter Your Network Password Make sure this password is correct. Your Tapo device will be unable to connect to the network if it's incorrect. Network Name X55 1.9.00   Reselect Password Case and space sensitive ○ Save Password Next Source: https://www.tp-link.com/us/support/faq/2710/ 5. It will start pairing your camera. Make sure the LED stays solid on during the pairing.

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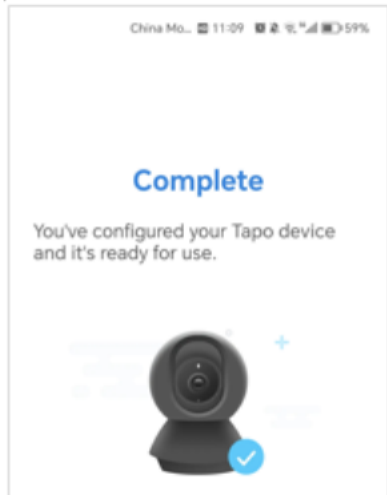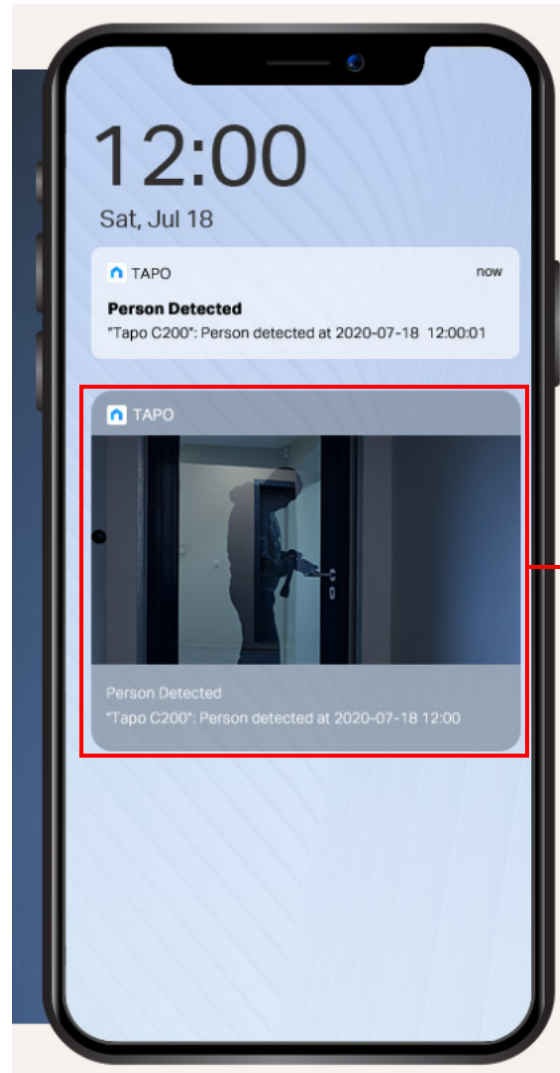|	
	Source: https://www.tp-link.com/us/support/faq/2710/ 7. The "Complete" page means the camera is successfully added and tap **Done** to start using your camera. Source: https://www.tp-link.com/us/support/faq/2710/ Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
[1.3] said at least one capturing device comprising a capture assembly, said capture assembly being structured to selectively capture the at least one	Company provides at least one capturing device and at least one receiving device, wherein the said at least one capturing device comprising a capture assembly, said capture assembly being structured to selectively capture the at least one digital photographic image, This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the camera comprises a lens and image sensor ("capture assembly"). Further, the camera comprises a feature of motion and person detection such that the camera monitors the activity zone marked by the user. When a person or motion is detected in the activity zone, camera captures the snapshot image

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digital photographic image,	("selectively capture the at least one digital photographic image"), generates a push notification alert and sends the captured snapshot to the user. Therefore, it would be apparent to a person having ordinary skill in the art that the camera selectively captures the shot in the marked area based on the person and motion detection. Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-spec Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-overview

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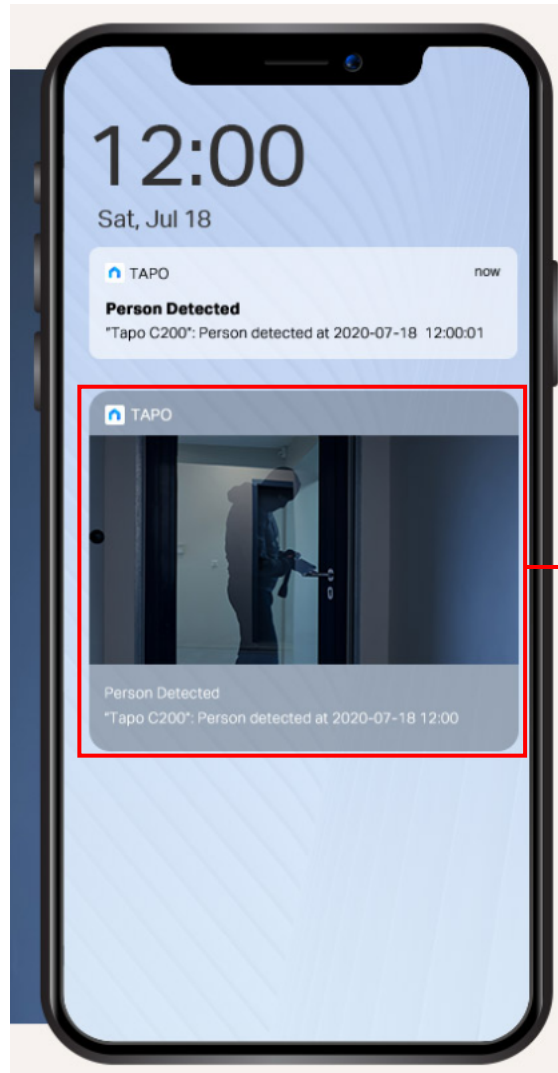

Digital photographic image

Source: https://www.tapo.com/us/tapocare/ (annotated)

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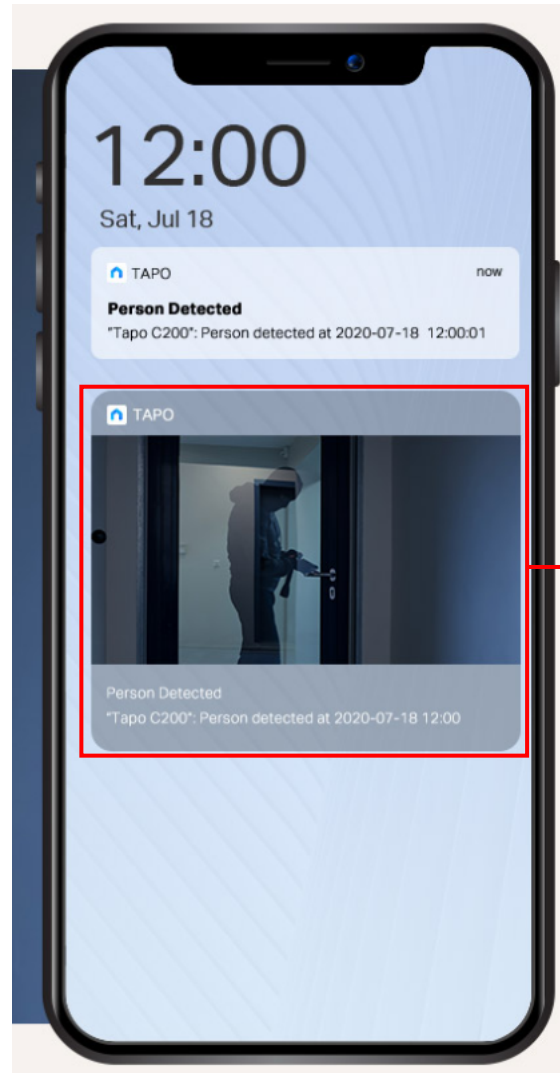|	
	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

[1.4] said capturing device further comprising a first network component, wherein said first network component is structured to communicate the at least one digital photographic image to said receiving device via said at least one wireless network, and	Company provides at least one capturing device and at least one receiving device, wherein the said capturing device further comprising a first network component, wherein said first network component is structured to communicate the at least one digital photographic image to said receiving device via said at least one wireless network.
	
	This element is infringed literally, or in the alternative, under the doctrine of equivalents.
	
	For example, when the motion or person is detected in the activity zone, the camera sends push notification alerts along with the captured snapshots to the user's mobile device, paired with the camera via Wi-Fi. Therefore, it would be apparent to a person having ordinary skill in the art that the camera comprises a Wi-Fi module ("first network component") that is structured to send snapshots to the user's mobile device via Wi-Fi.
	
	NETWORK Network Connectivity: Connect via Wi-Fi
	                                  Wireless Connectivity: IEEE 802.11b/g/n, 2.4 GHz Wi-Fi
	                                  RTSP: Yes
	                                    ONVIF: Yes
	
	Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-spec

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Digital photographic image to said receiving device

Source: https://www.tapo.com/us/tapocare/ (annotated)

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	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
[1.5] said receiving device comprising a second network component, wherein said second network component is structured to receive the at least one digital photographic image from said capturing device via said at least one wireless network, wherein	Company provides at least one capturing device and at least one receiving device, wherein the said receiving device comprising a second network component, wherein said second network component is structured to receive the at least one digital photographic image from said capturing device via said at least one wireless network. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, when the camera sends the push notification alerts, the user's mobile device, paired via Wi-Fi, receives the alerts along with the captured snapshots ("the at least one digital photographic image"). Therefore, it would be apparent to a person having ordinary skill in the art that the user's mobile device comprises a Wi-Fi module ("second network component") that receives the captured snapshots.

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receive the at least one digital photographic image

Source: https://www.tapo.com/us/tapocare/ (annotated)
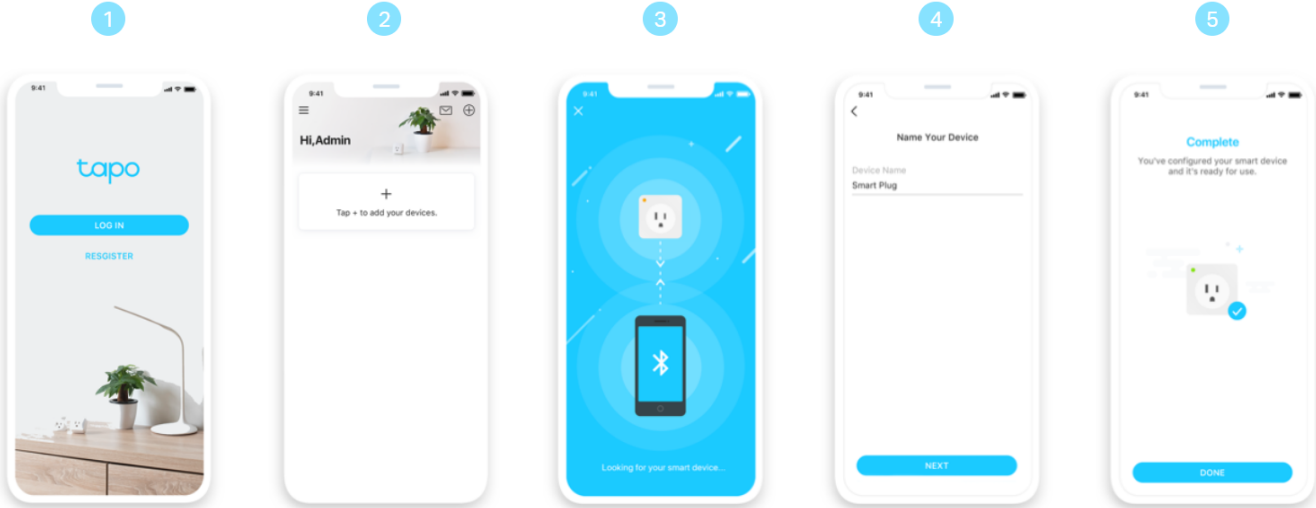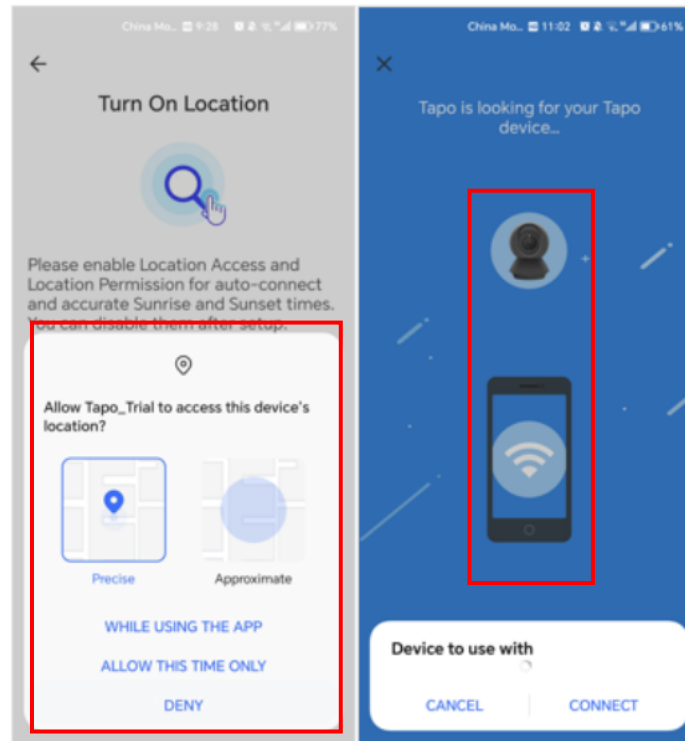
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	• **Detection & Instant Notification:** Get instant push notifications when motion · baby crying detection or a person is detected . Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-overview Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
[1.6] said capturing device and said receiving device are disposed in a selectively paired relationship with one another,	Company provides at least one capturing device and at least once receiving device, wherein the said capturing device and said receiving device are disposed in a selectively paired relationship with one another. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the camera and the user's mobile device are paired with each other via a Wi-Fi connection. Download and open Tapo App / Tap Plus (+) to add your smart device / Look for your device and connect / Name the device and choose the room it's in / Congratulations! You've now completed the configuration

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Source: https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-setup

3. Grant the location access and allow the location permission to find and connect to your camera. You can disable it after the setup. Then it will start looking for your camera.
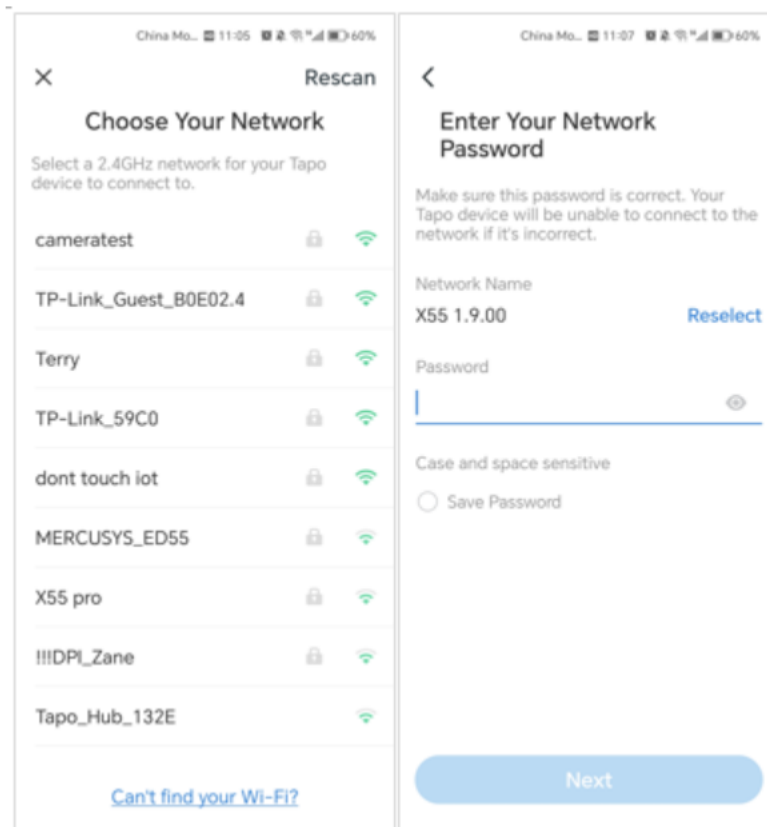

Source: https://www.tp-link.com/us/support/faq/2710/

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4. After the camera is found, connect the camera to your home Wi-Fi network and enter the password. Click **Next**.

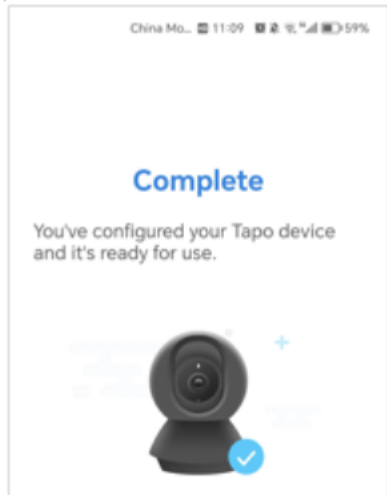Source: https://www.tp-link.com/us/support/faq/2710/

5. It will start pairing your camera. Make sure the LED stays solid on during the pairing.

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<table>
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Source: https://www.tp-link.com/us/support/faq/2710/

7. The "Complete" page means the camera is successfully added and tap **Done** to start using your camera.

Source: https://www.tp-link.com/us/support/faq/2710/

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

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[1.7] said selectively paired relationship is at least partially based on said capturing device and said receiving device being cooperatively associated with at least

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Company provides at least one capturing device and at least on receiving device, wherein said selectively paired relationship is at least partially based on said capturing device and said receiving device being cooperatively associated with at least one common pre-defined pairing criteria, and said pre-defined pairing criteria comprises a geographic location of said capturing device.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.
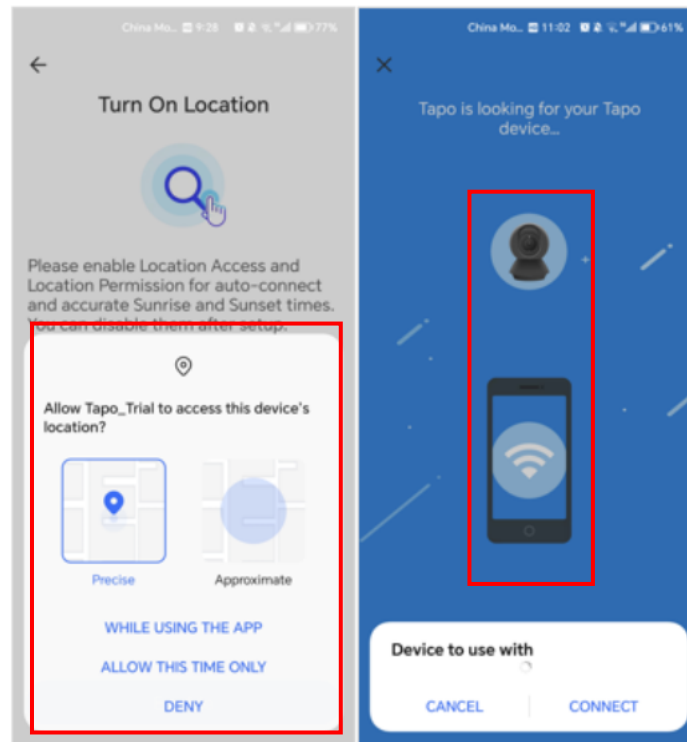
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</table>

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|	
one common pre-defined pairing criteria, and said pre-defined pairing criteria comprises a geographic location of said capturing device.	For example, while pairing the camera ("said capturing device") with the user's mobile device, the location access is granted such that the camera network is searched ("one common pre-defined pairing criteria") within proximity. Further, when the camera is successfully searched, the camera is connected to the Wi-Fi network with which the user's mobile device is connected, and the camera gets paired ("paired relationship") with the mobile device. Therefore, it would be apparent to a person having ordinary skill in the art that the pairing criteria comprise a geographic location of the camera. 3. Grant the location access and allow the location permission to find and connect to your camera. You can disable it after the setup. Then it will start looking for your camera. Source: https://www.tp-link.com/us/support/faq/2710/

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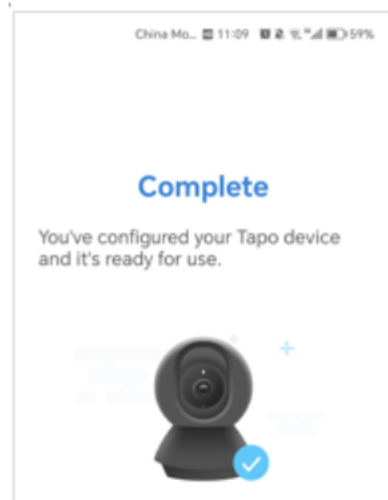| |
|---|
| **4. After the camera is found, connect the camera to your home Wi-Fi network and enter the password.** Click **Next**.

Source: https://www.tp-link.com/us/support/faq/2710/
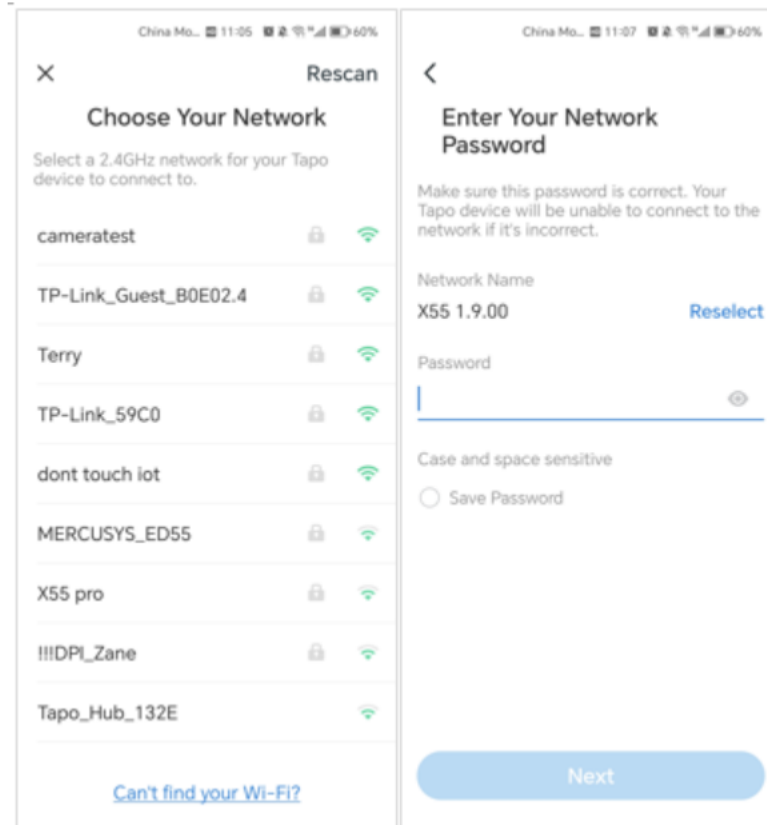
5. It will start pairing your camera. Make sure the LED stays solid on during the pairing. |

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2. List of References

1. https://www.tapo.com/us/tapocare/, last accessed on 18 March, 2024.
2. https://apps.apple.com/us/app/tp-link-tapo/id1472718009, last accessed on 18 March, 2024.
3. https://www.tp-link.com/us/, last accessed on 18 March, 2024.
4. https://www.tp-link.com/us/support/faq/2710/, last accessed on 18 March, 2024.
5. https://www.tapo.com/en/product/smart-camera/tapo-c211/#tapo-product-spec, last accessed on 18 March, 2024.